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**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, )  
Plaintiff, )  
v. )  
SERGIO SALGADO, )  
Defendant. )

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Case No.: 2:23-mj-0091-DJA

## **STIPULATION TO CLOSE CASE**

IT IS STIPULATED AND AGREED, by and between JASON M. FRIERSON,  
United States Attorney, and Skyler Pearson, Assistant United States Attorney, counsel for the  
United States of America, and Daniel Hill, Esquire, counsel for the defendant Sergio Salgado,  
that the above-captioned matter be closed.

This Stipulation is entered into based upon the following:

1. On or about December 13, 2023, defendant entered into a Petty Offense Agreement with the United States in which he agreed to plead guilty to Count One of the Complaint, Operating a Motor Vehicle while Under the Influence of Drugs and Alcohol, in violation of 36 C.F.R. § 4.23(a)(1). *See* ECF No. 11.

2. The parties agreed to recommend that defendant be sentenced to one year of unsupervised probation with the following special conditions: (i) pay a \$400.00 fine and a

1 mandatory \$10 penalty assessment; (ii) attend and complete the Lower Court Counseling's (1)  
2 DUI course and (2) Victim Impact Panel; (iii) complete an eight (8) hour online alcohol  
3 awareness course; (iv) not return to Lake Mead National Recreation Area for a period of six  
4 (6) months; and (v) not violate any local, state, or federal laws for a period of six (6) months.

5 If the defendant successfully completes his obligations within six months of unsupervised  
6 probation, the court will allow the defendant to withdraw his guilty plea to count one and the  
7 government will move to amend count one to reckless driving.  
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9       3. On December 13, 2023, this Court sentenced defendant pursuant to the parties'  
10 plea agreement. *See* ECF No. 11.

11       4. Since commencing her term of unsupervised probation, defendant has  
12 successfully completed conditions (i), (ii), (iii), and (iv).

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5. As such, the parties jointly request that the defendant be allowed to withdraw his guilty plea to count one and the government moves to amend count one to reckless driving. The parties also jointly request that the above-captioned matter be closed.

DATED this 12th day of September, 2024.

Respectfully submitted,

JASON M. FRIERSON  
United States Attorney

/s/ Daniel Hill  
DANIEL HILL, ESQ.  
Attorney for Defendant  
**SERGIO SALGADO**

/s/ Skyler Pearson  
SKYLER PEARSON  
Assistant United States Attorney

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## **ORDER TO CLOSE THE CASE**

SERGIO SALGADO,

Defendant.

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

Court finds that:

1. Defendant Sergio Salgado has successfully completed the conditions of his sentencing.

## ORDER

IT IS HEREBY ORDERED that the defendant is allowed to withdraw his guilty plea to count one and that the count one is amended to reckless driving.

IT IS FURTHER ORDERED that the case is closed.

DATED this 17<sup>th</sup> day of September, 2024

